Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

> Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently.

1. Name and address of registrant Collier, Shannon & Scott	2. Registration No.			
1055 Thomas Jefferson Street, N.W.	3694			
Washington, D.C. 20007				
3. Name of foreign principal		4. Principal addi	ress of foreign principal	
Zurich Insurance Company		Zurich Towers		
		1400 Ameri	ican Lane g,IL 60196	
5. Indicate whether your foreign principal is one of the fo	llowing type:	Denta ambar 8	, 15 -001 70	
☐ Foreign government				
☐ Foreign political party				
☐ Foreign or ☑ domestic organization: If either, check	one of the following:			
☐ Partnership	☐ Committee			
☑ Corporation	Corporation			
☐ Association	☐ Other (specify) _		• :	
☐ Individual—State his nationality				
6. If the foreign principal is a foreign government, state:				
a) Branch or agency represented by the registrant.	'90 MAR 20 P INTERNAL SEG SECTION REGISTRATION	CR.		
b) Name and title of official with whom registrant deals	ERNA SISTI	3 0 3 0 120		
•	R 20	<u> </u>		
	100 100 100 100 100 100 100 100 100 100	모습론		
7. If the foreign principal is a foreign political party, state:	- 4	- 5 000		
a) Deinstead address	URIT UNIT			
a) Principal address				
b) Name and title of official with whom registrant deals				
c) Principal aim				
			*	

- 8. If the foreign principal is not a foreign government or a foreign political party,
- a) State the nature of the business or activity of this foreign principal Zurich Insurance Company is a property/casualty insurance company. It is the U.S. Branch of Zurich Switzerland, an international property/casualty insurance company organized in 1872 under the law of Switzerland. Zurich Insurance Company is fully autonomous from its foreign parent in its day-to-day operations and has 1,200 employees. The branch started business in the U.S. in 1913 and is a domestic corporation of New York State.

b) Is this	foreign	principal
------------	---------	-----------

Owned by a foreign government, foreign political party, or other foreign principal	′es □	No 🗹
Directed by a foreign government, foreign political party, or other foreign principal	′es □	No 🗹
Controlled by a foreign government, foreign political party, or other foreign principal	′es 🗹	No □
Financed by a foreign government, foreign political party, or other foreign principal	′es □	No 🖭
Subsidized in whole by a foreign government, foreign political party, or other foreign principal	es □	No 🖭
Subsidized in part by a foreign government, foreign political party, or other foreign principal	′es □	No 🖭

Zurich Switzerland sets overall company policies which are adhered to by Zurich Insurance Company. The general operations of the Zurich Insurance Company, however, are carried out by its general manager who acts for the home office under power of attorney.

Date of Exhibit A

March 14, 1990

Name and Title

Michael D. Sherman, Esq.

Partner



^{9.} Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

^{10.} If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

U.S. Department of June 19 Washington, DC 20536 Exhibit B
To Registration Statement

OMB No. 1105-0007

Approval Expires Nov. 30, 1986

Under the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant

Collier, Shannon & Scott

Name of Foreign Principal

Zurich Insurance Company

Check Appropriate Boxes:

- 1. [1] The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- 2. [1] There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- 3. V The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

Registrant has undertaken to represent the interests of the foreign principal in connection with the taxation of U.S. branches of foreign property/casualty insurance companies. Registrant will be compensated on a periodic basis for providing services rendered to, and expenses incurred on behaf of, the foreign principal.

10 to 10 12 12

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Pamela J. Allen, an employee of the Registrant, will arrange a meeting with certain Administration officials, Members of Congress, and congressional staff to discuss a provision in the U.S. Internal Revenue Code that affects U.S. branches of foreign property/casualty insurers.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Ms. Allen will meet with members and staff of the House Ways and Means Committee, Senate Finance Committee, Joint Committee on Taxation, and Treasury Department officials to facilitate the repeal of 1.R.C. § 842 as it applies to U.S. branches of property/casualty insurers. Ms. Allen may also assist in the preparation of documents advocating repeal of 1.R.C. § 842.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(0) of the Act?¹
Yes 61 No 11

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Registrant will encourage the amendment of 1.R.C. § 842 which, under the Revenue Act of 1987, extended the application of the minimum investment income base to U.S. branches of foreign property/casualty insuarnce companies. In order to accomplish this objective, Registrant will meet with Administration officials, Members of Congress and congressional staff. Registrant may also disseminate material advocating the position of the foreign principal.

Date of Exhibit B

March 14, 1990

Name and Title

Michael D. Sherman, Esq. Partner Signature NAMEN-

Political activity as defined in Section 1(0) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrimate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.